

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Stephanie Walker

Case No.

Case: 2:21-mj-30118 Assigned To :  
 Unassigned Assign. Date : 3/10/2021  
 Description: RE: SEALED MATTER  
 (EOB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 2017 through May 2020 in the county of Oakland in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. 1343

Wire Fraud

18 U.S.C. 1341

Mail Fraud

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

*Randal T. Cummings*

Complainant's signature

Special Agent Randal Cummings

Printed name and title

Sworn to before me and signed in my presence  
 and/or by reliable electronic means.

*David R. Grand*

Judge's signature

Date: March 10, 2021

City and state: Detroit, MI

David R. Grand, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

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**I, Randal Cummings, being duly sworn, depose and state as follows:**

1. I am a Special Agent with Homeland Security Investigations ("HSI"), of the United States Department of Homeland Security ("DHS"). I am assigned to the Office of Investigations, in Detroit, Michigan. I have been employed with HSI since August 2010. I have successfully completed the Criminal Investigator Training Program and the Immigration and Customs Enforcement Special Agent Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. I was previously employed from September 2005 through August 2010 with the U.S. Department of Labor - Office of Labor-Management Standards as a Lead Criminal Investigator. I received a bachelor's degree in Criminal Justice from Michigan State University. I have been a member of the Southeast Michigan Financial Crimes Task Force since December 2014. My duties include the investigation of identity theft, access device fraud, as well as bank, wire and mail fraud.
2. The information set forth in this affidavit is based upon my knowledge and investigation, as well as from information that I have obtained from witnesses, other law enforcement officers, and the review of records and documents. This affidavit does not contain every fact that I have learned during the course of the investigation,

but instead includes only those facts which I believe are necessary establish probable cause.

3. In May 2020, P.T. and M.H., the owners of Michigan Pediatric ENT, reported to the West Bloomfield, Michigan Police Department that their office manager, STEPHANIE WALKER, embezzled approximately one million dollars from the business.

4. Affiant was informed that WALKER was hired in July 2017 as the office manager of the Michigan Pediatric ENT with a yearly salary of \$65,000.00. Victim, M.H. stated that he was contacted by his accountant who observed from the review of records that salary payments to WALKER'S had increased to \$85,000.00 in 2018, and to \$103,500.00 in 2019. However, P.T. and M.H., the owners of Michigan Pediatric ENT, advised that they had not increased WALKER'S salary since her date of hire.

5. M.H. contacted Chemical Bank NA, where Michigan Pediatric ENT does its banking, and obtained copies of all cancelled checks from the company account. Upon review, M.H. discovered that hundreds of fraudulent checks had been written to WALKER using the forged signature of M.H as the payor.

6. Chemical Bank is a financial institution, as defined by 18 U.S.C. §20.

7. On May 21, 2020, officers of the West Bloomfield Police Department executed a search warrant at WALKER'S residence, in Royal Oak, Michigan. There, they

seized, among other things, several pages of blank check stubs for Michigan ENT. The stubs were covered with “practice” signatures of M.H.’s name.

8. M.H. reviewed Michigan Pediatric ENT records from Chemical Bank and observed that deposits had been made into the business account with funds received from OnDeck and Kabbage, both online lenders. It appeared to M.H. that loans had been obtained and that the proceeds had been deposited into the corporate account to conceal the embezzlement by WALKER.

9. Records that investigators obtained from OnDeck and Kabbage indicated that M.H.’s banking information, driver’s license number, passport number, and social security number had been used to apply for and obtain the loans.

10. Investigators reviewed recordings of telephone conversations between OnDeck personnel and WALKER relating to the loan applications. During recorded conversations, WALKER claimed that she was authorized to act on behalf of M.H. and provided OnDeck representatives with the name, DOB and SSN of M.H.

11. Investigators determined that WALKER obtained \$80,000 from OnDeck in January of 2019. The funds were deposited into the Michigan Pediatric ENT checking account. A second OnDeck loan for \$95,000 was obtained in October 2019 and deposited in the Michigan ENT checking account. Finally, \$40,000 from Kabbage was obtained and deposited in May 2019. All three loans were obtained without the authorization or knowledge of either P.T. or M.H. In each of the above

transactions, funds were transferred by wire from accounts located outside of the State of Michigan to the Michigan Pediatric ENT account at Chemical Bank in the Eastern District of Michigan. OnDeck and Kabbage representatives have advised that they would not have approved and funded the loans had they known that WALKER was not authorized by Michigan Pediatric ENT or M.H. to apply for the loans.

12. Investigators reviewed all checks written to WALKER from the Michigan ENT business account at Chemical Bank and found that a total of \$991,744.58 was fraudulently obtained by WALKER from August 2017 to May 2020. Furthermore, WALKER deleted checks from Michigan ENT Quickbooks accounting records and falsely inflated operating expenses to conceal the fraud.

13. Based on the above, affiant believes that there is probable cause to establish that STEPHANIE WALKER committed wire fraud by fraudulently causing the OnDeck and Kabbage to approve and fund loans and to transfer the proceeds of said loans from locations outside of the State of Michigan to the Michigan Pediatric ENT account at Chemical Bank in the Eastern District of Michigan, in violation of 18 U.S.C. §1343. Affiant also believes that probable cause exists to establish that STEPHANIE WALKER committed bank fraud by fraudulently obtaining funds in the care, custody and control of a financial institution, that is, by fraudulently obtaining funds from the Michigan Pediatric ENT account at Chemical Bank by issuing checks to herself that were not authorized by the account holders.

Respectfully submitted,

*Randal T. Cummings*

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Randal Cummings, Affiant  
Special Agent  
Department of Homeland Security

Sworn to before me and signed in my presence  
and/or by reliable electronic means.



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David R. Grand  
United States Magistrate Judge  
March 10, 2021